

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

ERIN MOORE

PLAINTIFF

v.

CIVIL ACTION NO.: 3:20-CV-464-CWR-LRA

**CLARKE COUNTY, MS; SHERIFF TODD KEMP,
individually and in his official capacity as a duly
commissioned Sheriff for Clarke County, MS;
CHIEF DEPUTY BARRY WHITE, individually and
in his official capacity as a duly commissioned
Deputy for Clarke County, MS; DEPUTY BEN IVEY,
individually and in his official capacity as a duly
commissioned Deputy for Clarke County, MS; and
JOHN DOES 1-4**

DEFENDANTS

**PLAINTIFF'S RESPONSE TO DEFENDANT'S MOTION
TO TRANSFER VENUE**

COMES NOW Erin Moore, Plaintiff herein, by and through undersigned counsel, and files this, her Response to Defendant's Motion to Transfer Venue. The courthouse for the Eastern District previously located in Meridian, Mississippi, is closed. Therefore, for purposes of judicial economy, Plaintiff opposes the purely technical motion to transfer as the case will not be tried in the Eastern District.

Respectfully submitted this the 12th day of November, 2020.

ERIN MOORE, PLAINTIFF

BY: s/J. Stewart Parrish
J. Stewart Parrish, Attorney for Plaintiff
P.O. Box 823
Meridian, MS 39302-0823
(601) 696-4400
(601) 696-4455 (fax)

CERTIFICATE OF SERVICE

I, J. Stewart Parrish, Attorney for Plaintiff, Erin Moore, do hereby certify that on this date I caused to be electronically filed, the foregoing Plaintiff's Response to Defendant's Motion to Transfer Venue with the Clerk of the Court using the ECF system which sent notification of such filing to the following:

William R. Allen (#100541)
Lance W. Martin (MSB #105203)
Allen, Allen, Breeland & Allen, PLLC
P.O. Box 751
Brookhaven, MS 39602
(601) 833-4361 – phone
(601) 833-6647 – fax

wallen@aabalegal.com
lmartin@aabalegal.com

This, the 12th day of November, 2020.

s/ J. Stewart Parrish
J. Stewart Parrish